

THE HONORABLE BENJAMIN H. SETTLE

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

JOHN DOE #1, an individual; JOHN DOE
#2, an individual; and PROTECT
MARRIAGE WASHINGTON,

Plaintiffs,

v.

SAM REED, in his official capacity as
Secretary of State of Washington and
BRENDA GALARZA, in her official
capacity as Public Records Officer for the
Secretary of State of Washington,

Defendant.

No. C:09-cv-05456 BHS

INTERVENOR WASHINGTON
FAMILIES STANDING TOGETHER'S
MOTION TO FILE UNDER SEAL

NOTE ON MOTION CALENDAR:
September 15, 2010

Pursuant to Local Rule 5(g), Washington Families Standing Together ("WAFST")
hereby moves the Court for an order permitting it to file under seal Exhibits A and B to the
Declaration of Kevin J. Hamilton in support of WAFST's response to Plaintiffs' motion for
protective order. A proposed order accompanies this motion.

As indicated by their motion for protective order, Plaintiffs seek, among other things, to
keep confidential the identities of all their witnesses. WAFST opposes Plaintiffs motion. On
September 1, 2010, the Defendants and WAFST deposed two of Plaintiffs' witnesses. In
support of its opposition to Plaintiffs' motion for protective order, WAFST relies on the
testimony of these witnesses, attached as Exhibits A and B to the Declaration of Kevin J.

INTERVENOR WAFST'S MOTION TO FILE
UNDER SEAL (No. C:09-cv-05456 BHS) – 1

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1 Hamilton. While WAFST does not view the identity of the witnesses nor their testimony as
2 confidential, WAFST moves to file the deposition testimony under seal in order to allow
3
4 Plaintiffs the opportunity to explain why such testimony should be kept under seal.
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8 Respectfully submitted this 15th day of September, 2010.
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11 s/ Kevin J. Hamilton

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CERTIFICATE OF SERVICE

I certify that on September 15, 2010, I electronically filed Intervenor Washington Families Standing Together's Motion to File Under Seal with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following attorneys of record.

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I certify under penalty of perjury that the foregoing is true and correct.

DATED this 15th day of September, 2010.

s/ Kevin J. Hamilton

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